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INC. and SILICON MITUS
TECHNOLOGY, INC

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
(SAN JOSE DIVISION)

MAXIM INTEGRATED PRODUCTS, INC., and
VOLTERRA SEMICONDUCTOR LLC,

Plaintiffs,

v.

SILICON MITUS TECHNOLOGY, INC., and
SILICON MITUS, INC.

Defendants.

Case No. 5:17-cv-3507-NC

**STIPULATION AND PROPOSED ORDER
ALLOWING SERVICE OF AMENDED
PATENT LOCAL RULE 3-1
INFRINGEMENT CONTENTIONS**

IT IS HEREBY STIPULATED, by and between Plaintiffs Maxim Integrated Products, Inc.
and Volterra Semiconductor LLC (collectively, "Maxim"), and Defendants Silicon Mitus, Inc. and
Silicon Mitus Technology, Inc. (collectively, "Silicon Mitus"), that Maxim may serve amended

1 Patent L.R. 3-1 Disclosure of Asserted Claims and Infringement Contentions upon Silicon Mitus.
2 The proposed Amended Contentions were provided to counsel for Silicon Mitus on March 19,
3 2018. In support of this agreement, Maxim states the following:

4 On December 6, 2017, Maxim served its Patent L.R. 3-1 Disclosure of Asserted Claims and
5 Infringement Contentions and its Patent L.R. 3-2 Document Production Accompanying Disclosure
6 as required by the Court's October 30, 2017, Case Management Scheduling Order. (Dkt. No. 32).
7 Silicon Mitus produced technical document and source code discovery to Maxim on January 23,
8 February 8, March 6, and March 16, 2018, and Maxim inspected source code made available by
9 Silicon Mitus on February 6 and February 21-22, 2018. On March 19, 2018, Maxim provided
10 Silicon Mitus with redlined and clean copies of its proposed amended Patent L.R. 3-1 Disclosure of
11 Asserted Claims and Infringement Contentions, which incorporate information that had not been
12 made available to Maxim prior to the original, December 6, 2017 deadline for serving infringement
13 contentions.

14 Based on Maxim's factual summary as well as the early stage of the litigation, and in an
15 effort to avoid burdening the Court with a dispute on this issue, Silicon Mitus has agreed to allow
16 Maxim to make this amendment. The parties therefore request that the Court provide leave for the
17 service of Maxim's amended infringement contentions, such service to be deemed effective as of
18 the date the Court enters the proposed order set forth below, without further action required from
19 Maxim.

20 Accordingly, the parties hereby stipulate that Maxim may amend its Patent L.R. 3-1
21 Disclosure of Asserted Claims and Infringement Contentions to include the redlines shown on
22 Maxim's proposed amended Patent L.R. 3-1 Disclosure of Asserted Claims and Infringement
23 Contentions that was sent to Silicon Mitus on March 19, 2018.

1 Dated: April 2, 2018

FISH & RICHARDSON P.C.

2 By: /s/ David M. Barkan
3 David M. Barkan

4 Attorneys for Plaintiffs
5 MAXIM INTEGRATED PRODUCTS, INC.,
and VOLTERRA SEMICONDUCTOR LLC.

6 Dated: April 2, 2018

PILLSBURY WINTHROP SHAW PITTMAN
LLP

7 By: /s/ Dianne L. Sweeney
8 Dianne L. Sweeney

9 Attorneys for Defendants
10 SILICON MITUS, INC. and SILICON MITUS
11 TECHNOLOGY, INC.

12 I hereby attest under penalty of perjury that concurrence in the filing of this document has
13 been obtained from counsel for Defendants.

14 Dated: April 2, 2018

FISH & RICHARDSON P.C.

15 By: /s/ David M. Barkan
16 David M. Barkan

17 Attorneys for Plaintiffs
18 MAXIM INTEGRATED PRODUCTS, INC.,
19 and VOLTERRA SEMICONDUCTOR LLC.
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[PROPOSED] ORDER

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated: _____

Nathanael M. Cousins
U.S. Magistrate Judge